COMMENTS ON THE SUPPLEMENTAL FEASIBILITY STUDY FOR THE IDAHO CHEMICAL PROCESSING PLAN BY THE ENVIRONMENTAL PROTECTION AGENCY

1) Page 5-6, third paragraph. In all references to protectiveness of interim actions for Tank Farm soils, omit statements such as, "During the service life of the interim measures contaminant dispersion is believed to be insignificant." which imply that dispersion is an acceptable mechanism for providing protection of human health.

2) Page 5-8, third paragraph. To be consistent with the statement that all RAOs will be satisfied during the institutional control period, access controls provided by alternative 1 (No Action) **will** be protective of the environment and ecological receptors.
The statement, " The RAO to prevent migration of radionuclides for surface soils to contribute to groundwater contamination exceeding MCLs will not be achieved." may have to be revised if additional analyses show that there is no significant migration of soil contaminants during the six years of interim action. The last sentence at the bottom of page 5-8 also contradicts the above statement and may also have to be revised.

3) Page 5-10. Eliminate the last sentence on this page because the interim actions proposed for the Tank Farms soils do not require any soil remedial actions, therefore RCRA requirements for management of hazardous waste do not apply during the period of the interim action.

4) Page 5-11, last paragraph. Alternative 2, while it does provide additional groundwater data, won't help meet ARARs since it does not include any active source control measures. Eliminate the second sentence since it is not true that the groundwater pathway is effectively interrupted during the interim period for alternative 2, for the same reason as above.

5) Page 5-12, fourth paragraph. Alternative 2 cannot be considered superior to Alternative 1 (in terms of long-term effectiveness) due to the additional action of monitoring groundwater. Groundwater monitoring is not a remedial action, and therefore cannot have any long-term effectiveness.

6) Page 5-13, fourth paragraph. We don't know if the RAO to prevent migration of contaminants to the aquifer, in concentrations exceeding MCLs, will be met with Alternative 2. If, in fact, this RAO will be met under this alternative, there is little justification for implementing the surface water controls identified in Alternative 3.

7) Page 5-17, first paragraph. This paragraph may have to be revised if additional transport modeling shows that there is no significant migration of contaminants from the Tank Farm soils during the interim action period.

Fifth paragraph. Alternative 3 is not superior to Alternatives 1 and 2 due to proposed monitoring well surveillance (see comment #5).

8) Page 5-20, fifth paragraph. The use of additional institutional controls, such as deed restrictions, does not apply to this site but applies to the disposal site. As such, long-term institutional controls should not be included in Alternative 3.
CERCLA 5-year reviews do not need to be conducted after soil is removed from the site. Therefore, 5-year review are only needed prior to the removal action, approximately up until the year 2045.

9) Page 5-21, first paragraph. This whole discussion on additional institutional controls is not necessary since it applies to the disposal site and not to the site remediated. It can be assumed that the disposal site will have the necessary institutional controls to prevent future release of contaminated soil contained there.

10) Page 5-23, Last sentence. Eliminate this sentence since there is no reduction of toxicity, mobility or volume through treatment.

11) Page 5-24, last paragraph. Eliminate the fourth and fifth sentences of this paragraph because they are irrelevant.

12) Page 5-26, second bullet. Eliminate all references to reclassification of the aquifer. We've agreed that reclassification of the aquifer will not be considered as part of the remedial alternatives for the SRPA.

13) Page 5-29, Compliance with ARARs. Eliminate all references to exceedances of MCLs in the Perched Water. Since the Perched Water is not a viable drinking water source, drinking water ARARs (MCLs) do not apply to the Perched Water. (This may also have to be fixed in Alternatives 1 and 2 for the Perched Water in the original Feasibility Study.)

14) Page 5-30, Table 5-8. Eliminate drinking water standards under "Chemical Specific" ARARs.

15) Page 5-34, third paragraph. Alternative 1 should only include institutional controls which are currently in place specifically for the Buried Gas Cylinder site. Institutional controls currently in place for INEEL only prevent access to the general public, but do not prevent access for workers. The cost estimate for alternative 1 (page 5-38) should also be revised to eliminate any costs associated with general INEEL access controls.

16) Page 5-48, last paragraph, Cost. The costs identified in the third sentence are incorrect. The costs for Alternative 2 are $1.6M capital cost, and $325,000 O&M cost.

17) Page 5-49, first paragraph. Revise the reference to existing institutional controls in

Alternative 1 if it is decided that current INEEL controls are not effective in preventing access to the buried gas cylinder site.

18) Page 5-79, first paragraph. The discussion on long-term effectiveness of the grout for long-lived radionuclides should include the same caveat which applies to the containment barrier, which is described in the first paragraph on page 5-70 (i.e., the grout is only minimally effective since the 1,000 year isolation period provided by the grout is not significant relative to the long half-life of these radionuclides).

19) Page 6-6, paragraphs 5 and 6. Is there the potential that new groundwater wells installed as part of Alternatives 2 and 3 provide a pathway for contaminant migration to the groundwater? If so, then there is a risk for faster migration of contaminant to the groundwater and the short-term effectiveness of these alternatives will be adversely impacted.

20) Page 6-16, Table 6-9. For Alternatives 2 and 3 it is stated that Pu concentrations will exceed MCLs in the SRPA based on computer modeling. Explain in a footnote that this results is based on specific assumptions used in this modeling (i.e., low Kd values for Pu, perc pond closed, Big Lost River lined for 100 years, and Tank Farm soil capped for 1,000 years). This also applies to the discussion of Pu transport to the SRPA in paragraph 2 on page 6-19.

21) Page 6-17, Table 6-10. Eliminate reference to recategorization of the SRPA in footnote "b".
Also eliminate this language in paragraph 4 on page 6-19.

22) Page 6-30, Cost. Alternative 2 is the least expensive, Alternative 1 the next least expensive, and Alternative 3 is the most expensive.

23) Page 6-35, paragraph 3. For alternative 3, the potential lifetime of the solidified sludge is assumed to be 1,000 years. The same limitations on protectiveness which apply to the containment cap in alternative 2 should also apply to the solidified grout in alternative 3.
This also applies to paragraph 3 on page 6-37.